

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

MIDDLETOWN VALLEY BANK,

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Plaintiff,

*

v.

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Case No. C-10-CV-17-000131

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JUSTICE FARMS OF NORTH CAROLINA,
LLC, ET AL.

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Defendants.

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**REQUEST FOR ENTRY OF ORDER OF EXAMINATION
IN AID OF ENFORCEMENT PURSUANT TO MD RULE 2-633(b)**

Plaintiff Middletown Valley Bank (“Judgment Creditor”), by its undersigned attorney, hereby makes this request pursuant to Md. Rule 2-633(b) for entry of an Order of Examination in Aid of Enforcement against James C. Justice II (the “Judgment Debtor”), and states as follows:

1: The Court entered 8 separate judgments in favor of the Judgment Creditor and against Justice Farms of North Carolina LLC and the Judgment Debtor on December 7, 2017. The total judgments against the Deponent were in the aggregate amount of One Million Four Hundred Seventy-Nine Thousand Seven Hundred Ninety-One Dollars and Thirteen Cents (\$1,479,791.13) (collectively, the “Judgment”)¹.

2. More than thirty days have passed since the Court entered the Judgment.
3. As of April 17, 2019, the Judgment has not been satisfied.
4. The last known addresses for the Judgment Debtor are as follows:

James C. Justice, II
208 Dwyer Lane
Lewisburg, WV 24901

James C. Justice, II
1716 Kanawha Blvd. E.
Charleston, WV 25305

¹ At present the amount due and owing under the Judgment has been paid down such that, as of February 26, 2019, the total amount due under the Judgment, exclusive of certain unbilled attorneys' fees and costs, was Seven Hundred Twenty-Three Thousand Three Hundred Fifty-Four Dollars and Sixty-Seven Cents (\$723,354.67). Interest, cost, and attorneys' fees have continued to accrue since February 26, 2019.

5. The Judgment Creditor requests that, pursuant to MD Rule 2-633(b)(2), the Court order an examination of the Judgment Debtor before a judge or an examiner for purposes of aiding in the enforcement of the Judgment. Moreover, the Judgment Creditor requests that the Judgment Creditor be ordered to bring all bank books, papers, books and records relating to the personal estates and business transactions of the Judgment Debtor to such examination.

WHEREFORE, for the foregoing reasons, Plaintiff Middletown Valley Bank respectfully requests that an Order be entered requiring James C. Justice II to appear before a judge or examiner and answer all questions under oath in aid of enforcement of the Judgment at a time and place specified in the Order.

Respectfully submitted,

/s/Joshua D. Bradley

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